

1:32 pm, Aug 25 2021

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EGW: USAO 2020R00609

AT GREENBELT
CLERK, U.S. DISTRICT COURT
DISTRICT OF MARYLAND
BY _____ Deputy

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

ZHIYANG YANG,

Defendant

CRIMINAL NO. PWG-20-294

(Payment of Gratuities to a Public
Official, 18 U.S.C. § 201(c)(1)(A);
Forfeiture, 18 U.S.C. § 981(a)(1)(C),
21 U.S.C. § 853(p), 28 U.S.C. § 2461(c))

SUPERSEDING INFORMATION

COUNT ONE
(Payment of Gratuities to a Public Official)

The Acting United States Attorney for the District of Maryland charges that:

On or about October 11, 2019, in the District of Maryland, the defendant,

ZHIYANG YANG,

directly and indirectly gave, offered, and promised anything of value to any public official, otherwise than as provided by law for the proper discharge of official duty, for and because of any official act performed and to be performed by such public official, that is, the defendant offered and gave \$200 for and because of the purported provision of relaxed conditions of reporting to Immigration and Customs Enforcement.

18 U.S.C. § 201(c)(1)(A)

FORFEITURE ALLEGATION

The Acting United States Attorney for the District of Maryland further finds that:

1. Pursuant to Fed. R. Crim. P. 32.2, notice is hereby given to the defendant that the United States will seek forfeiture as part of any sentence in accordance with 18 U.S.C. § 981(a)(1)(C), 21 U.S.C. § 853(p), and 28 U.S.C. § 2461(c), in the event of the defendant's conviction under Count One of this Superseding Information.

2. Upon conviction of the offense set forth in Count One, the defendant,

ZHIYANG YANG,

shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to such offense.

Substitute Assets

3. If, as a result of any act or omission of any defendant, any of the property described above as being subject to forfeiture:
 - a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third person;
 - c. has been placed beyond the jurisdiction of the Court;
 - d. has been substantially diminished in value; or
 - e. has been commingled with other property which cannot be subdivided without difficulty,

the United States of America, pursuant to 21 U.S.C. § 853(p) as incorporated by 28 U.S.C. § 2461(c), shall be entitled to forfeiture of substitute property.

18 U.S.C. § 981(a)(1)(C)

21 U.S.C. § 853(p)

28 U.S.C. § 2461(c)

Date: August 25, 2021

Jonathan F. Lenzner^{b, em}

Jonathan F. Lenzner
Acting United States Attorney